IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

BETH CHANEY MacNEILL

S
VS.

NIRMAL JAYASEELAN, M.D.;

DOMINGO K. TAN, M.D.; CHAD

CARLTON, M.D.; TEXAS HEALTH

HARRIS METHODIST HOSPITAL FORT

WORTH; EMERGENCY MEDICINE

CONSULTANTS LTD.; BAYLOR ALL

SAINTS MEDICAL CENTER AT FORT

WORTH; and EMCARE, INC.

DEFENDANT EMERGENCY MEDICINE CONSULTANTS, LTD.'S RULE 12(b)(6) MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED

Defendant Emergency Medicine Consultants, Ltd., one of the Defendants in the above-styled and numbered cause (hereinafter "Defendant") moves to dismiss Plaintiff's claims pursuant to Federal Rule of Civil Procedure 12(b)(6) for failing to state a claim upon which relief can be granted.

I.

Support for the 12(b)(6) Motion to Dismiss is set forth in Defendant's Memorandum in Support of Rule 12(b)(6) Motion to Dismiss for Failure to State a Claim Upon Which Relief Can be Granted.

WHEREFORE, Defendant urges this Court, upon consideration and review of Defendant's Memorandum in Support of Motion to Dismiss for Failure to State a Claim Upon Which Relief Can be Granted, along with the other pleadings already a part of the Court's record

in this case, to dismiss Plaintiff's claims and cause of action against Defendant for failure to state a claim upon which relief can be granted and for further relief to which it may be justly entitled under the law.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2014 we electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented to accept this Notice as service of this document by electronic means.

/s/ Vernon L.	Krueger	